

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

LUIS AVELAR and MATEO GOMEZ,)	
individually and on behalf of all,)	
similarly-situated persons,)	
)	Civil No.: 3:22-cv-00292
Plaintiffs,)	
)	JUDGE ALETA A. TRAUGER
v.)	
)	COLLECTIVE AND CLASS ACTION
HC CONCRETE CONSTRUCTION)	COMPLAINT
GROUP, LLC and JON HARRIS,)	
)	JURY DEMAND
Defendants.)	

**JOINT MOTION FOR ENTRY OF
AMENDMENT TO AGREED PROTECTIVE ORDER**

The Parties jointly move the Court to enter an Amendment to the Agreed Protective Order to address information and documents designated “Attorneys’ Eyes Only.”

An Agreed Protective Order was entered in this case on July 21, 2023 (Doc. 47) wherein the Parties agreed on how to handle confidential and proprietary documents and information produced in discovery. The Agreed Protective Order does not address the process of limiting access to documents and information to the Parties’ attorneys.

The Parties have recently agreed that certain financial documents should be produced in discovery to facilitate settlement,¹ but the sensitive financial nature of those documents is such that Defendants have requested that they should be treated as “Attorneys’ Eyes Only.” Defendants are willing to produce the confidential and proprietary business information and financial records subject to the restrictions in the Amendment to Agreed Protective Order. Plaintiffs do not oppose

¹ Mediation of this case is scheduled for August 28, 2025.

these restrictions, and in fact the Amendment is the result of negotiations between counsel. A copy of the proposed Amendment to the Agreed Protective Order is attached hereto as Exhibit 1.

For the foregoing reasons, the Parties respectfully move the Court to grant this Joint Motion for Entry of Amendment to Agreed Protective Order.

Respectfully submitted,

s/ Kenneth A. Weber

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, the foregoing Joint Motion for Entry of Amendment to Agreed Protective Order was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

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